

1 Zachary T. Ball, Esq.  
2 Nevada Bar No. 8364  
3 **THE BALL LAW GROUP**  
4 3455 Cliff Shadows Parkway  
5 Suite 150  
6 Las Vegas, Nevada 89129  
7 Telephone: (702) 303-8600  
8 Email: [zball@balllawgroup.com](mailto:zball@balllawgroup.com)  
9 Attorney for *Summit Real Estate Group, Inc.*  
and *TerraFirma Venture, LLC*

7  
8 **UNITED STATES DISTRICT COURT**  
9  
10 **DISTRICT OF NEVADA**

10 U.S. BANK NATIONAL ASSOCIATION,  
11 AS TRUSTEE FOR GREENPOINT  
12 MORTGAGE FUNDING TRUST  
13 MORTGAGE PASS THROUGH  
14 CERTIFICATES, SERIES 2006-AR6,

15 Plaintiff,

16 vs.

17 SUMMIT REAL ESTATE GROUP, INC.;  
18 TERRAFIRMA VENTURE, LLC;  
19 CHARDONNAY TOWNHOMES  
20 OWNERS ASSOCIATION,

21 Defendants.

22 Case No.: 2:17-cv-00239-APG-CWHC

23 **STIPULATION AND ORDER TO  
24 EXTEND TIME TO FILE RESPONSE  
25 TO PLAINTIFF'S MOTION TO LIFT  
STAY [ECF NO. 19]**

26 Defendants, SUMMIT REAL ESTATE GROUP, INC. ("SUMMIT") and  
27 TERRAFIRMA VENTURE, LLC ("TERRAFIRMA") and Plaintiff, U.S. BANK N.A.,  
28 SUCCESSOR TRUSTEE TO BANK OF AMERICA, N.A., SUCCESSOR IN INTEREST TO  
LASALLE BANK N.A., ON BEHALF OF THE REGISTERED HOLDERS OF BEAR  
STEARNS ASSET BACKED SECURITIES I LLC, ASSET-BACKED CERTIFICATES,  
SERIES 2005-HE6 ("U.S. BANK"), by and through their respective counsel, hereby agree and  
stipulate as follows:

29 IT IS HEREBY AGREED AND STIPULATED, that the deadline for SUMMIT and  
30 TERRAFIRMA to Respond to Plaintiff U.S. BANK's Motion to Lift Stay filed on October 13,  
31 2017 [ECF No. 19] shall be extended from October 26, 2017 to November 27, 2017. The

1 purpose of this request is to allow the parties additional time for settlement negotiations.

2 This is SUMMIT and TERRAFIRMA's first request for an extension of this deadline and  
3 is not intended for the purposes of prejudice or delay.

4

5 DATED this 26th day of October, 2017.

6

THE BALL LAW GROUP LLC

7

/s/ Zachary T. Ball, Esq.

8

Zachary T. Ball, Esq., SBN 8364  
3455 Cliff Shadows Pkwy., Ste. 150  
Las Vegas, Nevada 89129  
Attorney for *Summit Real Estate Group,  
Inc. and Terra firma Venture, LLC*

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DATED this 26th day of October, 2017.

WRIGHT, FINLAY & ZAK, LLP

/s/ Patrick J. Davis, Esq.

Edgar C. Smith, Esq., SBN 5506  
Patrick J. Davis, Esq., SBN 13330  
7785 W. Sahara Avenue, Suite 200  
Las Vegas, Nevada 89117  
Attorneys for *Plaintiff, U.S. Bank National  
Association, as Trustee for Greenpoint  
Mortgage Funding Trust Mortgage Pass-  
Through Certificates, Series 2006-AR6*

**IT IS SO ORDERED.**

Dated: October 30, 2017.



UNITED STATES DISTRICT JUDGE